

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ROYAL INDEMNITY COMPANY	:	CIVIL CASE NO: 02-CV-3578
OF DELAWARE, as subrogee of	:	
National Assisted Living a/k/a	:	
Liberty Healthcare,	:	
	:	
Plaintiff	:	
v.	:	
	:	
ALPHA SPRINKLER, INC, and	:	
CENTRAL SPRINKLER COMPANY	:	
	:	
Defendants.	:	
	:	
v.	:	
	:	
SIEMENS BUILDING TECHNOLOGIES, INC.	:	
	:	
Third-Party Defendant.	:	

**PLAINTIFF’S COMPLAINT AGAINST THIRD-PARTY DEFENDANT, SIEMENS
BUILDNG TECHNOLOGIES, INC., PURSUANT TO RULE 14(a) OF THE FEDERAL
RULES OF CIVIL PROCEDURE**

1. Plaintiff, Royal Indemnity Company of Delaware (hereinafter “Royal”), initiated this action by filing a Complaint, a copy of which is attached hereto as Exhibit “A.”

2. Defendant and Third-Party Plaintiff, Central Sprinkler Company (hereinafter “Central”), filed a Third-Party Complaint against Third-Party Defendant, Siemens Building Technologies, Inc. (hereinafter “Siemens”), by which Central seeks indemnity or contribution from Siemens based upon theories set forth in the Third-Party Complaint, a copy of which is attached as Exhibit “B.”

3. The citizenship of Plaintiff, Royal, which is incorporated in Delaware and has a principal place of business in North Carolina, is diverse from the citizenship of Siemens, which

is a citizen of the State of Pennsylvania, and the amount in controversy exceeds the sum of Seventy Five Thousand (\$75,000) Dollars.

4. In the event that Siemens is found to have been careless, negligent or responsible for any other liability producing conduct which is determined by the fact finder to be a proximate cause of the Plaintiff's damages, pursuant to Rule 14(a) of the Federal Rules of Civil Procedure, Plaintiff asserts a direct claim against Third-Party Defendant, Siemens, for its damages, incorporating by reference the allegations set forth against Siemens in the Third-Party Complaint of Central.

WHEREFORE, Plaintiff, Royal Indemnity Company of Delaware, as subrogee of National Assisted Living a/k/a Liberty Healthcare, demands judgment against the Third-Party Defendant, Siemens Building Technologies, Inc., in an amount in excess of Four Hundred Thousand Dollars (\$400,000), together with pre-judgment interest and the costs of prosecuting this action.

RESPECTFULLY SUBMITTED

COZEN O'CONNOR

BY: _____
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Dated: _____